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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Parts 2, 21, 25 and)
94 of the Commission's Rules to) RM-8004
Accommodate Common Carrier and)
Private Op-Fixed Microwave Systems)
in Bands Above 3 GHz)

To: The Commission

ORIGINAL
FILE

COMMENTS OF CENTEL CORPORATION

Centel Corporation ("Centel") hereby submits its comments on the above-captioned petition for rulemaking filed by Alcatel Network Systems, Inc. ("Alcatel").¹ As detailed below, Centel generally supports Alcatel's proposal as an important first step in accommodating the needs of any 2 GHz fixed microwave users required to relocate to frequencies above 3 GHz.

I. INTRODUCTION

On February 7, 1992, the Commission issued a Notice of Proposed Rulemaking proposing the reallocation of 220 MHz of the 1.85 to 2.20 GHz band for emerging telecommunications technologies.² To accommodate existing users of the band, the Commission proposed to make available all fixed microwave

¹ See Public Notice, DA 92-705 (June 2, 1992). The petition for rulemaking was filed on May 22, 1992.

² Redevelopment of Spectrum To Encourage Innovation in the Use of New Telecommunications Technologies, Notice of Proposed Rulemaking, 7 FCC Rcd 1542 (1992).

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bands above 3 GHz. Specific eligibility requirements would be waived for relocated entities. However, the Notice did not address appropriate modifications of technical or operational rules to facilitate the migration of 2 GHz users to the higher frequency bands.

Recognizing that the specification and adoption of such criteria is essential to a meaningful evaluation of the Commission's proposed relocation scheme, Alcatel proposes rule modifications designed to accommodate 2 GHz users in these bands with minimal disruption to existing licensees. Specifically, its Petition urges the Commission to initiate a rulemaking to reallocate the 3.6-3.7, 3.7-4.2, 5.925-6.425, 6.525-6.875, 10.55-10.68 and 10.7-11.7 GHz bands to permit sharing by common carriers and private operational fixed microwave systems. The Petition also suggests modified eligibility, channelization, minimum path length, minimum channel loading, minimum capacity, frequency coordination, and antenna standards to accommodate displaced 2 GHz users in the subject frequency bands. Finally, Alcatel urges the Commission to adopt such criteria before requiring the displacement of fixed microwave users from the 2 GHz band.³

³ The Utilities Telecommunications Council ("UTC") has proposed similar rule modifications and revised operational standards to permit use of the 1.71-1.85, 3.7-4.2, 5.925-6.425, and 10.7-11.7 GHz bands by private microwave systems licensed under Part 94. Utilities Telecommunications Council, Petition for Rulemaking in the
(continued...)

II. ALCATEL'S PETITION PRESENTS A SOUND FOUNDATION FOR A
RULEMAKING ADDRESSING THE FUTURE USE OF FREQUENCIES
ABOVE 3 GHZ BY FIXED MICROWAVE LICENSEES

Centel concurs with Alcatel that meaningful evaluation of the Commission's emerging technologies proposal requires consideration of the feasibility of relocating 2 GHz users to frequencies above 3 GHz. Such feasibility, however, cannot adequately be assessed until technical and operational rules governing the relocated entities in these higher frequency bands are articulated and adopted.

Certain existing 2 GHz operations cannot practically and efficiently be accommodated in the higher frequency microwave bands as they are currently configured. Problem areas include incompatible channelization plans, loading standards and path length requirements. Before any relocation of existing 2 GHz users can occur, the operational rules for these bands must be revised to satisfy the spectrum needs of

³(...continued)

Matter of Amendment of Parts 2, 21, and 94 of the Commission's Rules to Accommodate Private Microwave Systems in the 1.71-1.85 GHz Bands and in Bands Above 3 GHz, RM-7981 (filed June 1, 1992). UTC emphasized that such rule changes should precede any involuntary relocation of 2 GHz microwave licensees to accommodate emerging technologies. In its Comments on the petition, Centel generally supported UTC's proposal, yet stressed that any such rule modifications should also take into account the relocation needs of common carrier microwave licensees in the heavily used 2.11-2.13 GHz and 2.16-2.18 GHz bands.

existing 2 GHz licensees.⁴ Centel supports Alcatel's Petition as providing an appropriate framework for promptly and effectively pursuing this goal.

Alcatel has attempted to use its practical knowledge of the existing operations of microwave licensees to develop a set of proposals that reflects real world needs. For this reason, Centel is in general agreement with the nature of the suggested rule modifications.⁵ For example, the higher frequency bands currently are channelized for high density uses. To facilitate relocation, a spectrum efficient plan that also accommodates the low and medium capacity uses common in the 2 GHz band -- like those found in many cellular systems -- is essential. Alcatel's proposal offers this flexibility while also preserving a substantial number of high capacity channels.

Alcatel has proposed to permit sharing of the higher frequency bands by common carrier and private operational fixed microwave systems on a co-primary basis. Centel agrees

⁴ Even if existing 2 GHz licensees are not forcibly relocated, the public interest still requires revising the operational rules governing these bands to accommodate the types of uses now found at 2 GHz. Modified rules that take into account current 2 GHz uses would encourage more productive negotiations between existing 2 GHz users and emerging technologies licensees to the extent that the latter need exclusive access to spectrum.

⁵ At such time as the Commission issues a notice of proposed rulemaking on this matter, Centel may comment in greater detail on the specific changes.

that such co-existence must be premised on successful frequency coordination and compatible technical performance. In that event, there appears to be no reason why the relocation bands should not be made available to both private licensees and common carriers.

III. PURSUIT OF ALCATEL'S PROPOSAL DOES NOT RELIEVE THE COMMISSION OF ITS OBLIGATION TO EXAMINE SHARING OF THE 2 GHZ SPECTRUM BETWEEN EXISTING LICENSEES AND NEW EMERGING TECHNOLOGIES PROVIDERS

Although the requested rulemaking would clearly facilitate the relocation of existing 2 GHz licensees, this action should not deter the Commission from thoroughly examining means of sharing the 2 GHz band between new technology providers and existing users. Given the potential deleterious impact of relocation on existing 2 GHz users, as documented by Centel in its comments in ET Docket 92-9,⁶ the Commission must ensure that such a step is not undertaken unnecessarily or prematurely.

Clearly, viable spectrum sharing techniques would offer a better solution -- permitting the development of emerging technologies while obviating the need for relocation and disruption of existing 2 GHz operations. A number of proposals pending at the Commission contemplate such spectrum

⁶ See Comments of Centel Corporation, ET Docket 92-9 (filed June 8, 1992).

sharing. The Commission should not conclude that relocation is necessary without fully evaluating these possibilities.⁷

IV. CONCLUSION

For the foregoing reasons, Centel urges the Commission to adopt Alcatel's petition. The Commission cannot seriously consider relocation of 2 GHz microwave licensees to higher frequency bands unless and until essential rule changes are implemented to accommodate such needs. Alcatel has proposed an important first step in that direction.

Respectfully submitted,

CENTEL CORPORATION

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⁷ As suggested above, however, modified rules are necessary to accommodate current users to the extent that new technology providers desire to negotiate individual relocation plans. Also, revised regulations must be in place so that entities that might otherwise use 2 GHz facilities will have a viable alternative.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 1992, I caused copies of the foregoing "Comments of Centel Corporation" to be mailed via first-class postage prepaid mail to the following:

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